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District of Nevada
Nevada Bar Number 7709

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

George Harris,

Plaintiff,

v.

United States of America,

Defendant.

Case No. 2:22-cv-00022-JCM-VCF

**Stipulation and Order to
Reschedule Hearing on Plaintiff's
Motion for a Protective Order (ECF
No. 20)**

(First Request)

The United States respectfully requests that the court reschedule the hearing on Plaintiff's Motion for a Protective Order (ECF No. 20) set on August 21, 2023, at 2:00 p.m., as it conflicts with a pre-planned deposition of a non-party medical witness in this case that is scheduled at the same date and time as the hearing. *See* Ex. A, Plaintiff's Notice of Video Deposition. Plaintiff does not oppose this request.

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1 This request is submitted in good faith and not for purposes of undue delay.

2 Respectfully submitted this 9th day of August 2023.

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4 SIMON LAW

5 /s/ Benjamin J. Miller
6 BENJAMIN J. MILLER, ESQ.
7 Nevada Bar No. 10406
8 810 S. Casino Center Blvd.
9 Las Vegas, NV 89101
10 *Attorneys for Plaintiff*

JASON M. FRIERSON
United States Attorney

/s/ R. Thomas Colonna
R. THOMAS COLONNA
Assistant United States Attorney
Attorneys for the United States

11 IT IS HEREBY ORDERED that the
12 hearing scheduled for August 21,
13 2023, is RESCHEDULED to an in-
14 person hearing at 10:00 AM,
15 September 5, 2023, in Courtroom
16 3D.

17 **IT IS SO ORDERED:**

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19 **UNITED STATES MAGISTRATE JUDGE**

20 **DATED:** 8-9-2023
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EXHIBIT A

Plaintiff's Notice of Video Deposition

DANIEL S. SIMON, ESQ.
Nevada Bar No. 4750
BENJAMIN J. MILLER, ESQ.
Nevada Bar No. 10406
ASHLEY M. FERREL, ESQ.
Nevada Bar No. 12207
SIMON LAW
810 S. Casino Center Blvd.
Las Vegas, NV 89101
Phone: (702) 364-1650
Facsimile: (702) 364-1655
Email: lawyers@simonlawlv.com
Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

GEORGE HARRIS,

Plaintiff,

vs.

UNITED STATES OF AMERICA,

Defendant.

CASE NO.: 2:22-cv-00022-JCM-VCF

PLAINTIFF'S NOTICE OF VIDEO DEPOSITION
TO MITCHELL HUMPRHEYS, MD

TO: MITCHELL HUMPHREYS, MD;
Mayo Clinic Legal Department
200 First Street SW
Rochester, MN 55905

YOU WILL PLEASE TAKE NOTICE that on the **21st day of August, 2023, at 2:00 p.m.**, Plaintiff will take the deposition of **MITCHELL HUMPHREYS, MD**. Said deposition will take place via video conference by appearing via web-based videoconferencing hosted by Oasis Reporting Services upon oral examination pursuant to FRCP 30, before an officer authorized by law to administer oaths. Participants may attend by appearing via web-based videoconferencing only.

1 The Deponent and Participants shall appear via remote video conference at the below
2 link:

3 http://remotecounsel.com/meetings/J_VktrIZQzU/join
4 **Password**
5 **131330**
6 **Dial-In: 646-568-7788**
7 **Meeting ID: 936-347-47362**

8 PLEASE TAKE FURTHER NOTICE that pursuant to FRCP 30(b)(2), Plaintiff may record
9 the deposition via video/audio and/or take the photograph of the deponent in addition to the
10 stenographic record.

11 PLEASE TAKE FURTHER NOTICE that if the deposition is cancelled or continued at the
12 request of the deponent/deponent's counsel less than seven (7) days before the date/time of the
13 deposition as scheduled, the deponent/deponent's counsel will be responsible for payment of the
14 cancellation fee for the court reporter and the interpreter, if one has been scheduled.

15 Dated this 1 day of August, 2023.

16 **SIMON LAW**

17 

18 **DANIEL S. SIMON, ESQ.**

19 Nevada Bar No. 4750

20 **BENJAMIN J. MILLER, ESQ.**

21 Nevada Bar No. 10406

22 **ASHLEY M. FERREL, ESQ.**

23 Nevada Bar No. 12207

24 810 S. Casino Center Blvd.

25 Las Vegas, Nevada 89101

26 Attorneys for Plaintiff
27
28

CERTIFICATE OF MAILING

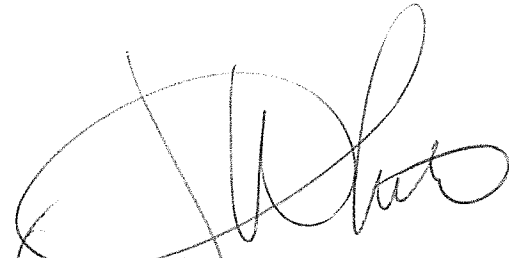
I hereby certify that on this 1st day of August, 2023, I served the above and foregoing

PLAINTIFF'S NOTICE OF VIDEO DEPOSITION TO MITCHELL HUMPHREYS, MD by

placing the original thereof in a sealed envelope, with first class postage fully prepaid thereon, and

depositing same in the United States Mail at Las Vegas, Nevada, addressed as follows:

JASON FRIERSON, ESQ.
Acting United States Attorney
District of Nevada
R. THOMAS COLONNA, ESQ.
Assistant United States Attorney
501 Las Vegas Blvd. So., Suite 1100
Las Vegas, Nevada 89101
Attorneys for the United States


An employee of SIMON LAW